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March 13, 2013

BY E-FILING

Chief Judge Gregory M. Sleet
U.S. District Court for the District of Delaware
844 North King Street, Room 4209, Unit 18
Wilmington, DE 19801

Re: *Valcom, Inc. v. Vellardita, et al.*
C.A. No. 1:12-cv-00749-GMS

Dear Judge Sleet:

In anticipation of the discovery teleconference scheduled for Thursday, March 14 at 11:30 a.m. in the above-captioned matter, the parties jointly submit the following items to be presented to the Court:

Plaintiff's Issues:

- Within the last week, Plaintiff requested the opportunity to meet and confer with Defendant's counsel as to its objections to Defendant's document production responses. Consistent with Defendant's concerns, Plaintiff objects to Defendant's responses as incomplete. Counsel was unable to meet for this purpose; however, Defendant's counsel would not consent to adjourn the hearing scheduled for March 14, 2013 to address Plaintiff's objections. Plaintiff submits that for reasons of judicial economy, all parties positions should be dealt with at one time on the hearing date.
- Plaintiff will be making an initial document production response prior to the March 14, 2013 hearing date and plans to supplement same.

Defendant's Issues:

- Plaintiff's failure to produce documents.

Respectfully submitted,

/s/ Ryan Patrick Newell

Ryan Patrick Newell (Del. Bar. No. 4744)

cc: Richard Cross, Esquire
David Holmes, Esquire
Neal H. Flaster, Esquire

